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Now, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOHN L. SUPROCK, an individual, LAURIE L.
SUPROCK, an individual, CONSORTIUM LLC,
a South Dakota limited liability company, and
RENEWABLE ENERGY NOW, LLC, a
Montana limited liability company,

Plaintiffs,

v.

QUANTUM ENERGY, INC., a Nevada
corporation, and CLEARTRUST, LLC, a Florida
limited liability company,

Defendants.

CASE No.: 2:22-CV-00494-JAD-BNW

*Consolidated with Case No.
2:21-cv-02184-JAD-BNW*

**STIPULATION AND PROPOSED
ORDER TO EXTEND DISPOSITIVE
MOTION AND PRE-TRIAL ORDER
DEADLINES**

(SECOND REQUEST)

Plaintiffs John L. Suprock (“Mr. Suprock”), Laurie L. Suprock (“Mrs. Suprock”), Consortium LLC (“Consortium”), and Renewable Energy Now, LLC (“Renewable Energy” and, collectively, with Mr. Suprock, Mrs. Suprock, and Consortium, “Plaintiffs”) and Defendant Quantum Energy, Inc. (“Defendant” and, collectively with Plaintiffs, the “Parties”), by and through their counsel of record, jointly move the Court to continue the remaining deadlines for dispositive motions and the joint pre-trial order by sixty (60) days to permit time for the Court to rule on the following pending motions: (1)

Defendant's motion to dismiss (ECF No. 55); (2) Defendant's motion to strike (ECF No. 54); (3) Plaintiffs' motion strike (ECF No. 48); (4) Plaintiffs' motion to amend (ECF No. 49); and (5) Plaintiffs' motion to withdraw or supplement their motion for summary judgment (ECF No. 50) (the "Motions").

1. Pursuant to LR IA 6-1, this is the Parties' second joint request to continue discovery deadlines in the Scheduling Order granted by this Court in the 22-CV-494 Action on June 27, 2022 (22-CV-494 ECF No. 24). Defendant previously moved to extend the deadline for the close of discovery to January 9, 2023, which extension Magistrate Judge Youchah granted. (*See* 22-CV-494 ECF No. 49). Following consolidation, this Court extended the close of discovery to January 31, 2023, and set March 2, 2023 as the deadline for dispositive motions, and April 2, 2023 (or 30 days after the final dispositive motion is ruled on, whichever is later) as the deadline for the Proposed Joint Pretrial Order. (ECF No. 51).

2. It is respectfully submitted that the rulings on the Motions will affect the dispositive motions in this matter and thus, for efficiency's sake, briefing should not occur until the rulings are made. The continuance requested herein is not sought for the purposes of delay and will not result in prejudice to the Parties or the Court. Accordingly, the Parties jointly request that the Court continue all deadlines in accordance with the below schedule:

<u>Deadline</u>	<u>Current Date</u>	<u>Proposed New Date</u>
<u>Discovery Cutoff</u>	<u>January 31, 2023</u>	<u>No change.</u>
<u>Dispositive Motions</u>	<u>Thursday, March 2, 2023</u>	<u>Monday, May 1, 2023</u>
<u>Pretrial Order</u>	Monday, April 3, 2023 ¹	Monday, June 1, 2023 (or 30 days after the final dispositive motion is ruled on, whichever is later)

IT IS SO STIPULATED.

[Parties signatures on following page]

¹ Deadlines that fall on a Sunday have been scheduled for the next judicial day.

1 Dated this 7th day of February, 2023.

2 **WILEY PETERSEN**

3 */s/ Jonathan D. Blum*

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17 *Suprock, Consortium LLC, and Renewable*
18 *Energy Now, LLC*

Dated this 7th day of February, 2023.

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Attorneys for Defendant Quantum Energy,
Inc.

ORDER

IT IS SO ORDERED.

22 
23 **UNITED STATES MAGISTRATE JUDGE**

24 **DATED:** February 8, 2023
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